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Of Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

NICOLE GILILLAND, an individual

No. 6:19-cv-00283-MK

Plaintiff,

vs.

**RESPONSE TO PLAINTIFF'S
ATTORNEY'S MOTION TO
WITHDRAW**

SOUTHWESTERN OREGON
COMMUNITY COLLEGE DISTRICT
by and through its BOARD OF
EDUCATION, an Oregon community
college district and board;
SOUTHWESTERN OREGON
COMMUNITY COLLEGE, an Oregon
community college; PATTY SCOTT,
an individual; TIM DAILY, an individual;
FRANCISCO SALDIVAR, an individual;
SUSAN WALKER, an individual;
MELISSA SPERRY, an individual;
PAMELA WICK, an individual,

Defendants.

Defendants do not object to opposing counsel's Motion to Withdraw as Plaintiff's Attorney. However, to the extent Plaintiff wishes to continue with this action, Defendants respectfully request that the Court order her to obtain new counsel within thirty (30) days to allow this matter to continue on its current schedule.

Over the last several weeks, Plaintiff has sent email messages directly to defense counsel

making threats and demands, despite a reminder that she continues to be represented and that all communications will need to go through her attorney until the Motion to Withdraw is ruled upon. Given the tone and content of Plaintiff's email messages, several of which are submitted as exhibits to the contemporaneously filed Declaration of Luke Reese, Defendants respectfully request that the Court either require Plaintiff to obtain counsel or show cause why she should be allowed to proceed pro se.

Pursuant to the Court's most recent Order (Docket Number 17) discovery is to be completed by April 20, 2020. The parties have exchanged written discovery and, after the Court enters an Order on counsel's Motion to Withdraw, Defendants intend to submit Interrogatories followed by Dispositive Motions. An Order requiring plaintiff to obtain new counsel within thirty (30) days will help the parties move past plaintiff's current threats and allow this matter to be resolved through the appropriate process and pursuant to the current schedule.

DATED this 3rd day of February 2020.

GARRETT HEMANN ROBERTSON P.C.



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CERTIFICATE OF SERVICE

I hereby certify that I caused to be served the foregoing **Response to Plaintiff's Attorney's Motion to Withdraw** on the date indicated below,

- ☒ Via First-Class Mail with postage prepaid
- ☒ Via Electronic Filing
- ☐ Via Facsimile Transmission
- ☐ Via Hand Delivery
- ☐ Via Overnight Delivery

to the following person(s) a true copy thereof, contained in a sealed envelope (if other than by facsimile transmission), addressed to said person(s) at their last known addresses indicated below:

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DATED February 3, 2020

GARRETT HEMANN ROBERTSON P.C.

s/ Luke W. Reese

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